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## RECENT CASES.

## CORPORATIONS.

*Street Railroads—Refusal to Give Transfer—Action for Penalty.*—*Meyers v. Brooklyn Heights R. R. Co.*, 41 N. Y. Sup. 798. The law will not enforce a penalty for refusal to give a transfer to "any passenger desiring to make one continuous trip" between two points on a street railway system, where it appears the passenger was riding solely for the purpose of demanding the transfer and recovering the penalty on refusal. He is not, within the term of the statute, a passenger seeking to make one continuous trip on the connecting lines of the system.

*Street Railroads—Contributory Negligence—Failure to Look Back.*—*Rooks v. Houston, W. S. & P. F. R. Co.*, 41 N. Y. Sup. 824. If a person, while riding a bicycle along and upon a cable car track, is struck by an overtaking car he is guilty of no contributory negligence from the mere fact of his failure to look back for such car. The law imposes no such duty upon a person.

*Street Railway Companies—Improvements of Streets—Contracts.*—*Borough of Shamokin v. Shamokin St. Ry. Co.*, 35 Atl. Rep. 862 (Pa. St.). A street railway company was required by the terms of its grant to lay its tracks on the grade of the streets thus used, and to share with the municipality the expense of "repairing or macadamizing" any of these streets. The company received notice that the municipality had decided to pave a street with asphalt; also that its tracks therein were not placed on the proper grade. The company paid no attention and the municipality, by itself, changed the grade of the tracks and paved the entire street. Held, that the company is liable to the municipality for the cost of altering the tracks and also for the preliminary work of paving the street, but not for the actual laying of the asphalt.

*Carriers of Passengers—Steamboats—Liability as Innkeeper.*—*Adams v. New Jersey Steamboat Co.*, 45 N. E. 369 (N. J.). Money for traveling expenses was stolen from a cabin passenger on a steamboat without negligence either on his part or that of the carrier. "The relations that exist between a steamboat and